

Scott J. Steiner
Hogan & Rossi
3 Starr Ridge Rd.
Suite 200
Brewster, NY 10509
Telephone: (845) 279-2986
sjsteiner@hoganandrossi.com
Attorneys for Defendant

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

JESUS GONZALEZ,

CASE NO.: 1:20-CV-9196 (ER)

Plaintiff,

-against-

**NOTICE OF MOTION
TO DISMISS**

INN ON THE HUDSON LLC,

Defendant.

-----X

PLEASE TAKE NOTICE, that upon the Summons and Complaint filed in this action, the Declaration of Kevin Patel, dated March 3, 2021, and the exhibit attached to the Declaration submitted in support of this motion, Defendant will Move this Court before the Hon. Edgardo Ramos, at the United States Courthouse, 40 Foley Square, Courtroom 619, New York, NY in accordance with the February 10, 2021 pre-motion conference, for an order pursuant to Rules 12(b)(1) and 12(b)(6) of the Federal Rules of Civil Procedure, directing the dismissal of the Complaint for lack of subject matter jurisdiction and for failure to state a claim upon which relief can be granted, with such other and further relief as may seem just and proper to the Court.

Dated: White Plains, NY
March 3, 2021

Respectfully submitted,
Hogan & Rossi

By:

_____/s/_____
Scott J. Steiner
Attorneys Defendant
3 Starr Ridge Rd.
Brewster, NY 10509
(845) 279-2986
sjsteiner@hoganandrossi.com

To: Erik Mathew Bashian
Bashian & Papantoniou, P.C
500 Old Country Road, Suite 302
Garden City, NY 11530
(516)-279-1555
Email: eb@bashpaplaw.com